

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOYA M. KINNEY,

Defendant.

Case No. 8:25–CR–117

**UNOPPOSED MOTION TO  
DEPOSIT FUNDS TOWARD  
RESTITUTION IN ADVANCE OF  
SENTENCING**

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COMES NOW, the Defendant, Joya M. Kinney, by and through her undersigned counsel, and hereby respectfully requests the permission of this Honorable Court to deposit the sum of \$80,000.00 with the Clerk of the District Court, prior to sentencing, as a good faith payment toward a portion of the restitution anticipated to be ordered in this case. In support of this Motion, Defendant states as follows:

1. On May 6, 2025, Mrs. Kinney signed a plea agreement wherein she agreed to plead guilty to Count I of an Information alleging a violation of 18 U.S.C. § 666(a)(1)(A);
2. Pursuant to this written plea agreement, Mrs. Kinney has agreed to pay restitution in the amount of at least \$452,176.00;
3. On June 17, 2025, Mrs. Kinney appeared before the Honorable Michael D. Nelson and pleaded guilty to Count I of the Information, consistent with her plea agreement;
4. Mrs. Kinney's sentencing is currently scheduled to take place on September 24, 2025;
5. Mrs. Kinney has taken considerable measures to begin the process of repaying the restitution that will be Ordered this in this case, and

seeks to pay the sum of \$80,000.00 in advance of her sentencing, with the recognition that she will be required to continue making payments toward the ultimate sum this Court imposes;

6. Undersigned counsel has discussed this Motion with Assistant United States Attorney John E. Higgins, and he has no opposition.

WHEREFORE, the Defendant respectfully requests that this Honorable Court issue an Order granting the Defendant permission to deposit the sum of \$80,000.00 with the Clerk of the District Court, prior to sentencing, as a good faith payment toward a portion of the restitution anticipated to be ordered in this case.

Very respectfully submitted,

*s/Ryan S. Crnkovich*

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*Attorney for Defendant*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 14th day of July, 2025 a true and correct copy of the foregoing pleading and was electronically filed with the Clerk of the United States Court for the District of Nebraska using the CM/ECF filing system which sent notification of such filing to the following recipients:

John E. Higgins  
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/s/ Ryan S. Crnkovich  
Ryan S. Crnkovich, NE Bar #25741  
Attorney for Defendant